

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA**

UNITED STATES OF AMERICA)	
)	No. 1:24-cr-82
v.)	
)	JUDGES McDONOUGH/STEGE
JAMES C. THOMPSON)	

GOVERNMENT’S RESPONSE

The government hereby responds to the defendant’s Sentencing Memorandum. (Doc. 10, Sentencing Memorandum.) The parties have entered into an agreement in which the defendant is to be sentenced to 20 years in prison. A 20-year term of imprisonment meets all the sentencing factors set forth in 18 U.S.C. § 3553(a), and the government urges the Court to accept the agreement. The government does not contest some of the defendant’s claims in the Sentencing Memorandum. Most notably, the government agrees the defendant confessed and pleaded guilty at an early stage of the proceedings. The government has no reason to doubt the defendant’s own claims to having been sexually abused but offers the following response.

If the defendant is in fact a product of the cycle of sexual abuse, he more than anyone, with an abundance of resources, from one of the wealthiest communities in the nation, should have known the consequences of sexual abuse and should have resisted the urge to offend. Repetition of generational abuse is neither mitigating nor excusable. Indeed, all wrongs are cyclical: poverty to theft; addiction to distribution; and trauma to violence. Unfortunately, culture and custom offer little resistance: children are thoughtlessly groomed to violence; social media grooms to early sexuality; and the relief between the peaks of wealth and valleys of poverty have only increased. Notwithstanding the cycle of abuse and a complacent culture,

the community requires the *individual* to disrupt the pattern. When he abdicates, it becomes the responsibility of the Courts and the prisons to stand up and address it.

The imposition of a 20-year prison sentence is where justice starts in this case. From here, the defendant must serve the sentence, and the victims can now hopefully begin to heal. The goal of the lengthy prison term is to exact a penalty consistent with the defendant's conduct, commensurate with the ongoing suffering of the victims and their families, to specifically deter this defendant from reoffending, and to generally deter all like-minded potential offenders. To be clear, this sentence is intended to outpace the defendant's capacity to reoffend.

Respectfully submitted, this the 23rd day of December 2024.

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